

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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HUGH HECKMAN,

Plaintiff,

v.

WNET and APC WORKFORCE  
SOLUTIONS II, LLC

Defendants.

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Case No. 1:18-cv-09854-DAB

Honorable Deborah A. Batts, U.S.D.J.

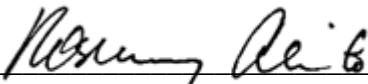
**NOTICE OF MOTION**

**PLEASE TAKE NOTICE** that the undersigned counsel for defendant APC Workforce Solutions II, LLC, d/b/a ZeroChaos (“ZeroChaos”) in the above-captioned action shall move before the Honorable Deborah A. Batts, United States District Judge, at the United States District Court for the Southern District of New York, Daniel Patrick Moynihan United States Courthouse, 500 Pearl St., New York, NY 10007-1312, for an order staying this action solely as to the claims against ZeroChaos and compelling arbitration pursuant to the Mutual Agreement to Arbitrate Claims between Plaintiff Hugh Heckman and ZeroChaos, in accordance with the Federal Arbitration Act (9 U.S.C. §§ 3, 4, 206).

**PLEASE TAKE FURTHER NOTICE** that Defendant shall rely upon the supporting Memorandum of Law, the Declaration of Donna Martin (with Exhibits), the form of Stipulation and Consent Order submitted herewith, and the pleadings previously filed in this action.

**PLEASE TAKE FURTHER NOTICE** that Plaintiff Hugh Heckman consents to this motion.

**K&L GATES LLP**  
Attorneys for Defendant  
APC Workforce Solutions II, LLC

A handwritten signature in cursive script, appearing to read "Rosemary Alito", is written over a horizontal line.

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Dated: January 7, 2019